

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RAFAEL GARCIA,	:	
<i>Plaintiff,</i>	:	CIVIL ACTION
	:	No. 24-cv-06316-JFM
v.	:	
	:	
CITY OF PHILADELPHIA, et al.,	:	
<i>Defendants.</i>	:	

DEFENDANT CITY OF PHILADELPHIA'S CERTIFICATION
THAT THE PARTIES HAVE MET AND CONFERRED PRIOR TO FILING RULE 12 MOTION

I, Peter G. Erdely, counsel for Defendant City of Philadelphia, hereby certify that:

On April 11, 2025, I telephonically met and conferred with Jill Johnston, Esquire, counsel for Plaintiff, regarding the substance of City's Motion to Dismiss the Amended Complaint Pursuant to F.R.C.P. 12(b)(6) (the "Motion"). The Plaintiff and the City were unable to agree regarding the issues raised in the City's Motion. The Plaintiff and the City agree that Discovery should not proceed while the City's Motion is pending.

Respectfully submitted,

/s/ Peter G. Erdely
Aleena Y. Sorathia (PA ID No. 318994)
Katelyn Mays (PA ID No. 324246)
Peter Erdely (PA ID No. 79993)
Ahmad Zaffarese LLC
1 S. Broad Street, Suite 1910
Philadelphia, PA 19107
asorathia@azlawllc.com
kmays@azlawllc.com
perdely@azlawllc.com

Attorneys for the City of Philadelphia

April 15, 2025

CERTIFICATE OF SERVICE

I certify that, on this day, a true and correct copy of the above Certification were electronically filed with the Office of the Clerk of the United States District Court for the Eastern District of Pennsylvania. Copies of these documents are available for viewing and downloading on the Court's ECF system.

Respectfully submitted,

/s/ Aleena Y. Sorathia
Aleena Y. Sorathia (PA ID No. 318994)
Katelyn Mays (PA ID No. 324246)
Peter Erdely (PA ID No. 79993)
Ahmad Zaffarese LLC
1 S. Broad Street, Suite 1910
Philadelphia, PA 19107
asorathia@azlawllc.com
kmays@azlawllc.com
perdely@azlawllc.com

Attorneys for the City of Philadelphia

April 15, 2025